

**West Virginia Department of Environmental Protection
Division of Air Quality**

*Joe Manchin, III
Governor*

*Randy C. Huffman
Cabinet Secretary*

Permit to Operate



*Pursuant to
Title V
of the Clean Air Act*

Issued to:
**E. I. du Pont de Nemours & Co.
Washington Works
Polyvinyl Butyral Production
R30-10700001-2010 (Part 4 of 14)**

*John A. Benedict
Director*

Issued: April 19, 2010 • Effective: May 3, 2010

Expiration: April 19, 2015 • Renewal Application Due: October 19, 2014

Permit Number: **R30-10700001-2010 (Part 4 of 14)**
Permittee: **E. I. du Pont de Nemours & Co.**
Facility Name: **Washington Works**
Business Unit: **Polyvinyl Butyral Production**
Permittee Mailing Address: **P. O. Box 1217, Washington, WV 26181-1217**

This permit is issued in accordance with the West Virginia Air Pollution Control Act (West Virginia Code §§ 22-5-1 et seq.) and 45CSR30 — Requirements for Operating Permits. The permittee identified at the above-referenced facility is authorized to operate the stationary sources of air pollutants identified herein in accordance with all terms and conditions of this permit.

Facility Location:	Washington, Wood County, West Virginia
Facility Mailing Address:	P. O. Box 1217, Washington, WV 26181-1217
Telephone Number:	(304) 863-4240
Type of Business Entity:	Corporation
Facility Description:	Production of polyvinyl butyral (PVB) resin particles and sheeting.
SIC Codes:	2821
UTM Coordinates:	442.368 km Easting • 4,346.679 km Northing • Zone 17

Permit Writer: Carrie McCumbers

Any person whose interest may be affected, including, but not necessarily limited to, the applicant and any person who participated in the public comment process, by a permit issued, modified or denied by the Secretary may appeal such action of the Secretary to the Air Quality Board pursuant to article one [§§ 22B-1-1 et seq.], Chapter 22B of the Code of West Virginia. West Virginia Code §22-5-14.

Issuance of this Title V Operating Permit does not supersede or invalidate any existing permits under 45CSR13, 14 or 19, although all applicable requirements from such permits governing the facility's operation and compliance have been incorporated into the Title V Operating Permit.

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Appendix A: R13-2380D Attachments

Appendix B: R13-2617C Attachment

1.0 Emission Units and Active R13, R14, and R19 Permits

1.1 Emission Units

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Control Device
B01	B01	Unloading System	1972	None
B01A, B01B, B01C, B01D	B01A, B01B, B01C, B01D	Solids Processing System	1972	None
B02A, B02B, B02C	B02A, B02B, B02C	Solution Processing System	Pre-1970 to 2001	None
B03A	B03A	Raw Material System	1984	None
B03B	B03B	Drum Filling Station	1974	None
B03C	B03C	Raw Material System	1982	None
B03E	Inside Vent	Raw Material Tank	1986	None
B03F	Inside Vent	Raw Material Tank	2003	None
B03G	Inside Vent	Raw Material System	2000	None
B03H	Inside Vent	Raw Material System	2001	None
B03I	Inside Vent	Raw Material System	2000	None
B03J	B03J	Raw Material Tank	2007	None
B05	B05	Tankcar Unloading System	Pre-1970	None
B06A, B06B	B06A, B06B	Storage System	Pre-1970	None
B08A	B07A, B08A, or B08B	Reactor System (B8-1 through B8-4)	1981-1984	B08A or B08B Scrubber or None
B08B	B07B, B08A, or B08B	Reactor System (B8-5 through B8-8)	1984-2001	B08A or B08B Scrubber or None
B12F	B12F	Steam Squelcher, ETF	1990	None
B24A	B24	Agitated Sump	Pre-1970	None
B24B-1	B24	Screener (South)	1972	None
B24B-2	B24	Screener (North)	1991	None
B25	B25	Biosump System	Pre-1970	None
B26A	Inside Vent	Slurry Washing System	Pre-1970 to 2003	None
B26B	Inside Vent	Slurry Blending System	Pre-1970 to 1990	None

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Control Device
B30	B30	Drying System	1990	B30 Baghouse
B31A	Closed Loop	Conveying – to storage	1990	None
B31	B31	Storage System	1990	None
B32A	B32A	Rework System	1990	None
B32C	Inside Vent	Drying Feed System	1990	None
B32D	Closed Loop	Conveying – to loading	1990	None
B50A	B50A-1, B50A-2, B50A-3, B50A-4	Exhaust System	1985	None
B52A	Inside Vent	Maintenance Parts Washer	Pre-1970	None
B53A, B53B1, B53B2	B53A, B53B	Gas Heating/HVAC	1975	None
B53C	Inside Vent	Hot Water Heater	1975	None
B54	Inside Vent	Physical Process Parts Cleaner	1995	None
B55	B55	Oven Exhaust Fan	2004	None
B72B	B72B	Raw Material Tank	Pre-1970	None
B74	B74-1, B74-2, B74-3, B74-4, B74-5, B74-6, B74-7, B74-8	Climate Control System	1980 to 1990	None

1.2. Active R13, R14, and R19 Permits

The underlying authority for any conditions from R13, R14, and/or R19 permits contained in this operating permit is cited using the original permit number (e.g. R13-1234). The current applicable version of such permit(s) is listed below.

Permit Number	Date of Issuance
R13-1230	April 23, 1990
R13-2380D	March 27, 2009
R13-2617C	July 13, 2007

2.0 General Conditions

2.1. Definitions

- 2.1.1. All references to the "West Virginia Air Pollution Control Act" or the "Air Pollution Control Act" mean those provisions contained in W.Va. Code §§ 22-5-1 to 22-5-18.
- 2.1.2. The "Clean Air Act" means those provisions contained in 42 U.S.C. §§ 7401 to 7671q, and regulations promulgated thereunder.
- 2.1.3. "Secretary" means the Secretary of the Department of Environmental Protection or such other person to whom the Secretary has delegated authority or duties pursuant to W.Va. Code §§ 22-1-6 or 22-1-8 (45CSR§30-2.12.). The Director of the Division of Air Quality is the Secretary's designated representative for the purposes of this permit.
- 2.1.4. Unless otherwise specified in a permit condition or underlying rule or regulation, all references to a "rolling yearly total" shall mean the sum of the monthly data, values or parameters being measured, monitored, or recorded, at any given time for the previous twelve (12) consecutive calendar months.

2.2. Acronyms

CAAA	Clean Air Act Amendments	NO_x	Nitrogen Oxides
CBI	Confidential Business Information	NSPS	New Source Performance
CEM	Continuous Emission Monitor		Standards
CES	Certified Emission Statement	PM	Particulate Matter
C.F.R. or CFR	Code of Federal Regulations	PM₁₀	Particulate Matter less than
CO	Carbon Monoxide		10µm in diameter
C.S.R. or CSR	Codes of State Rules	pph	Pounds per Hour
DAQ	Division of Air Quality	ppm	Parts per Million
DEP	Department of Environmental Protection	PSD	Prevention of Significant Deterioration
FOIA	Freedom of Information Act	psi	Pounds per Square Inch
HAP	Hazardous Air Pollutant	SIC	Standard Industrial Classification
HON	Hazardous Organic NESHAP		
HP	Horsepower	SIP	State Implementation Plan
lbs/hr or lb/hr	Pounds per Hour	SO₂	Sulfur Dioxide
LDAR	Leak Detection and Repair	TAP	Toxic Air Pollutant
m	Thousand	TPY	Tons per Year
MACT	Maximum Achievable Control Technology	TRS	Total Reduced Sulfur
		TSP	Total Suspended Particulate
mm	Million	USEPA	United States Environmental Protection Agency
mmBtu/hr	Million British Thermal Units per Hour		
mmft³/hr or mmcf/hr	Million Cubic Feet Burned per Hour	UTM	Universal Transverse Mercator
NA or N/A	Not Applicable	VEE	Visual Emissions Evaluation
NAAQS	National Ambient Air Quality Standards	VOC	Volatile Organic Compounds
NESHAPS	National Emissions Standards for Hazardous Air Pollutants		

2.3. Permit Expiration and Renewal

- 2.3.1. Permit duration. This permit is issued for a fixed term of five (5) years and shall expire on the date specified on the cover of this permit, except as provided in 45CSR§30-6.3.b. and 45CSR§30-6.3.c.
[45CSR§30-5.1.b.]
- 2.3.2. A permit renewal application is timely if it is submitted at least six (6) months prior to the date of permit expiration.
[45CSR§30-4.1.a.3.]
- 2.3.3. Permit expiration terminates the source's right to operate unless a timely and complete renewal application has been submitted consistent with 45CSR§30-6.2. and 45CSR§30-4.1.a.3.
[45CSR§30-6.3.b.]
- 2.3.4. If the Secretary fails to take final action to deny or approve a timely and complete permit application before the end of the term of the previous permit, the permit shall not expire until the renewal permit has been issued or denied, and any permit shield granted for the permit shall continue in effect during that time.
[45CSR§30-6.3.c.]

2.4. Permit Actions

- 2.4.1. This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
[45CSR§30-5.1.f.3.]

2.5. Reopening for Cause

- 2.5.1. This permit shall be reopened and revised under any of the following circumstances:
 - a. Additional applicable requirements under the Clean Air Act or the Secretary's legislative rules become applicable to a major source with a remaining permit term of three (3) or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to 45CSR§30-6.6.a.1.A. or B.
 - b. Additional requirements (including excess emissions requirements) become applicable to an affected source under Title IV of the Clean Air Act (Acid Deposition Control) or other legislative rules of the Secretary. Upon approval by U.S. EPA, excess emissions offset plans shall be incorporated into the permit.
 - c. The Secretary or U.S. EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
 - d. The Secretary or U.S. EPA determines that the permit must be revised or revoked and reissued to assure compliance with the applicable requirements.

[45CSR§30-6.6.a.]

2.6. Administrative Permit Amendments

- 2.6.1. The permittee may request an administrative permit amendment as defined in and according to the procedures specified in 45CSR§30-6.4.
[45CSR§30-6.4.]

2.7. Minor Permit Modifications

- 2.7.1. The permittee may request a minor permit modification as defined in and according to the procedures specified in 45CSR§30-6.5.a.
[45CSR§30-6.5.a.]

2.8. Significant Permit Modification

- 2.8.1. The permittee may request a significant permit modification, in accordance with 45CSR§30-6.5.b., for permit modifications that do not qualify for minor permit modifications or as administrative amendments.
[45CSR§30-6.5.b.]

2.9. Emissions Trading

- 2.9.1. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in the permit and that are in accordance with all applicable requirements.
[45CSR§30-5.1.h.]

2.10. Off-Permit Changes

- 2.10.1. Except as provided below, a facility may make any change in its operations or emissions that is not addressed nor prohibited in its permit and which is not considered to be construction nor modification under any rule promulgated by the Secretary without obtaining an amendment or modification of its permit. Such changes shall be subject to the following requirements and restrictions:
- a. The change must meet all applicable requirements and may not violate any existing permit term or condition.
 - b. The permittee must provide a written notice of the change to the Secretary and to U.S. EPA within two (2) business days following the date of the change. Such written notice shall describe each such change, including the date, any change in emissions, pollutants emitted, and any applicable requirement that would apply as a result of the change.
 - c. The change shall not qualify for the permit shield.
 - d. The permittee shall keep records describing all changes made at the source that result in emissions of regulated air pollutants, but not otherwise regulated under the permit, and the emissions resulting from those changes.
 - e. No permittee may make any change subject to any requirement under Title IV of the Clean Air Act (Acid Deposition Control) pursuant to the provisions of 45CSR§30-5.9.

- f. No permittee may make any changes which would require preconstruction review under any provision of Title I of the Clean Air Act (including 45CSR14 and 45CSR19) pursuant to the provisions of 45CSR§30-5.9.

[45CSR§30-5.9.]

2.11. Operational Flexibility

- 2.11.1. The permittee may make changes within the facility as provided by § 502(b)(10) of the Clean Air Act. Such operational flexibility shall be provided in the permit in conformance with the permit application and applicable requirements. No such changes shall be a modification under any rule or any provision of Title I of the Clean Air Act (including 45CSR14 and 45CSR19) promulgated by the Secretary in accordance with Title I of the Clean Air Act and the change shall not result in a level of emissions exceeding the emissions allowable under the permit.

[45CSR§30-5.8]

- 2.11.2. Before making a change under 45CSR§30-5.8., the permittee shall provide advance written notice to the Secretary and to U.S. EPA, describing the change to be made, the date on which the change will occur, any changes in emissions, and any permit terms and conditions that are affected. The permittee shall thereafter maintain a copy of the notice with the permit, and the Secretary shall place a copy with the permit in the public file. The written notice shall be provided to the Secretary and U.S. EPA at least seven (7) days prior to the date that the change is to be made, except that this period may be shortened or eliminated as necessary for a change that must be implemented more quickly to address unanticipated conditions posing a significant health, safety, or environmental hazard. If less than seven (7) days notice is provided because of a need to respond more quickly to such unanticipated conditions, the permittee shall provide notice to the Secretary and U.S. EPA as soon as possible after learning of the need to make the change.

[45CSR§30-5.8.a.]

- 2.11.3. The permit shield shall not apply to changes made under 45CSR§30-5.8., except those provided for in 45CSR§30-5.8.d. However, the protection of the permit shield will continue to apply to operations and emissions that are not affected by the change, provided that the permittee complies with the terms and conditions of the permit applicable to such operations and emissions. The permit shield may be reinstated for emissions and operations affected by the change:

- a. If subsequent changes cause the facility's operations and emissions to revert to those authorized in the permit and the permittee resumes compliance with the terms and conditions of the permit, or
- b. If the permittee obtains final approval of a significant modification to the permit to incorporate the change in the permit.

[45CSR§30-5.8.c.]

- 2.11.4. "Section 502(b)(10) changes" are changes that contravene an express permit term. Such changes do not include changes that would violate applicable requirements or contravene enforceable permit terms and conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements.

[45CSR§30-2.39]

2.12. Reasonably Anticipated Operating Scenarios

2.12.1. The following are terms and conditions for reasonably anticipated operating scenarios identified in this permit.

- a. Contemporaneously with making a change from one operating scenario to another, the permittee shall record in a log at the permitted facility a record of the scenario under which it is operating and to document the change in reports submitted pursuant to the terms of this permit and 45CSR30.
- b. The permit shield shall extend to all terms and conditions under each such operating scenario; and
- c. The terms and conditions of each such alternative scenario shall meet all applicable requirements and the requirements of 45CSR30.

[45CSR§30-5.1.i.]

2.13. Duty to Comply

2.13.1. The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the West Virginia Code and the Clean Air Act and is grounds for enforcement action by the Secretary or USEPA; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

[45CSR§30-5.1.f.1.]

2.14. Inspection and Entry

2.14.1. The permittee shall allow any authorized representative of the Secretary, upon the presentation of credentials and other documents as may be required by law, to perform the following:

- a. At all reasonable times (including all times in which the facility is in operation) enter upon the permittee's premises where a source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect at reasonable times (including all times in which the facility is in operation) any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit;
- d. Sample or monitor at reasonable times substances or parameters to determine compliance with the permit or applicable requirements or ascertain the amounts and types of air pollutants discharged.

[45CSR§30-5.3.b.]

2.15. Schedule of Compliance

- 2.15.1. For sources subject to a compliance schedule, certified progress reports shall be submitted consistent with the applicable schedule of compliance set forth in this permit and 45CSR§30-4.3.h., but at least every six (6) months, and no greater than once a month, and shall include the following:
- a. Dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when such activities, milestones or compliance were achieved; and
 - b. An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measure adopted.

[45CSR§30-5.3.d.]

2.16. Need to Halt or Reduce Activity not a Defense

- 2.16.1. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. However, nothing in this paragraph shall be construed as precluding consideration of a need to halt or reduce activity as a mitigating factor in determining penalties for noncompliance if the health, safety, or environmental impacts of halting or reducing operations would be more serious than the impacts of continued operations.

[45CSR§30-5.1.f.2.]

2.17. Emergency

- 2.17.1. An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

[45CSR§30-5.7.a.]

- 2.17.2. Effect of any emergency. An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions of 45CSR§30-5.7.c. are met.

[45CSR§30-5.7.b.]

- 2.17.3. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

- a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;
- b. The permitted facility was at the time being properly operated;
- c. During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and

- d. Subject to the requirements of 45CSR§30-5.1.c.3.C.1, the permittee submitted notice of the emergency to the Secretary within one (1) working day of the time when emission limitations were exceeded due to the emergency and made a request for variance, and as applicable rules provide. This notice, report, and variance request fulfills the requirement of 45CSR§30-5.1.c.3.B. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

[45CSR§30-5.7.c.]

- 2.17.4. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.

[45CSR§30-5.7.d.]

- 2.17.5. This provision is in addition to any emergency or upset provision contained in any applicable requirement.

[45CSR§30-5.7.e.]

2.18. Federally-Enforceable Requirements

- 2.18.1. All terms and conditions in this permit, including any provisions designed to limit a source's potential to emit and excepting those provisions that are specifically designated in the permit as "State-enforceable only", are enforceable by the Secretary, USEPA, and citizens under the Clean Air Act.

[45CSR§30-5.2.a.]

- 2.18.2. Those provisions specifically designated in the permit as "State-enforceable only" shall become "Federally-enforceable" requirements upon SIP approval by the USEPA.

2.19. Duty to Provide Information

- 2.19.1. The permittee shall furnish to the Secretary within a reasonable time any information the Secretary may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Secretary copies of records required to be kept by the permittee. For information claimed to be confidential, the permittee shall furnish such records to the Secretary along with a claim of confidentiality in accordance with 45CSR31. If confidential information is to be sent to USEPA, the permittee shall directly provide such information to USEPA along with a claim of confidentiality in accordance with 40 C.F.R. Part 2.

[45CSR§30-5.1.f.5.]

2.20. Duty to Supplement and Correct Information

- 2.20.1. Upon becoming aware of a failure to submit any relevant facts or a submittal of incorrect information in any permit application, the permittee shall promptly submit to the Secretary such supplemental facts or corrected information.

[45CSR§30-4.2.]

2.21. Permit Shield

2.21.1. Compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance provided that such applicable requirements are included and are specifically identified in this permit or the Secretary has determined that other requirements specifically identified are not applicable to the source and this permit includes such a determination or a concise summary thereof.
[45CSR§30-5.6.a.]

2.21.2. Nothing in this permit shall alter or affect the following:

- a. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance; or
- b. The applicable requirements of the Code of West Virginia and Title IV of the Clean Air Act (Acid Deposition Control), consistent with § 408 (a) of the Clean Air Act.
- c. The authority of the Administrator of U.S. EPA to require information under § 114 of the Clean Air Act or to issue emergency orders under § 303 of the Clean Air Act.

[45CSR§30-5.6.c.]

2.22. Credible Evidence

2.22.1. Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee including but not limited to any challenge to the credible evidence rule in the context of any future proceeding.
[45CSR§30-5.3.e.3.B. and 45CSR38]

2.23. Severability

2.23.1. The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this permit to any circumstance is held invalid by a court of competent jurisdiction, the remaining permit terms and conditions or their application to other circumstances shall remain in full force and effect.
[45CSR§30-5.1.e.]

2.24. Property Rights

2.24.1. This permit does not convey any property rights of any sort or any exclusive privilege.
[45CSR§30-5.1.f.4]

2.25. Acid Deposition Control

2.25.1. Emissions shall not exceed any allowances that the source lawfully holds under Title IV of the Clean Air Act (Acid Deposition Control) or rules of the Secretary promulgated thereunder.

- a. No permit revision shall be required for increases in emissions that are authorized by allowances acquired pursuant to the acid deposition control program, provided that such increases do not require a permit revision under any other applicable requirement.
- b. No limit shall be placed on the number of allowances held by the source. The source may not, however, use allowances as a defense to noncompliance with any other applicable requirement.
- c. Any such allowance shall be accounted for according to the procedures established in rules promulgated under Title IV of the Clean Air Act.

[45CSR§30-5.1.d.]

- 2.25.2. Where applicable requirements of the Clean Air Act are more stringent than any applicable requirement of regulations promulgated under Title IV of the Clean Air Act (Acid Deposition Control), both provisions shall be incorporated into the permit and shall be enforceable by the Secretary and U. S. EPA.

[45CSR§30-5.1.a.2.]

3.0 Facility-Wide Requirements

3.1. Limitations and Standards

- 3.1.1. **Open burning.** The open burning of refuse by any person is prohibited except as noted in 45CSR§6-3.1. [45CSR§6-3.1.]
- 3.1.2. **Open burning exemptions.** The exemptions listed in 45CSR§6-3.1 are subject to the following stipulation: Upon notification by the Secretary, no person shall cause or allow any form of open burning during existing or predicted periods of atmospheric stagnation. Notification shall be made by such means as the Secretary may deem necessary and feasible. [45CSR§6-3.2.]
- 3.1.3. **Asbestos.** The permittee is responsible for thoroughly inspecting the facility, or part of the facility, prior to commencement of demolition or renovation for the presence of asbestos and complying with 40 C.F.R. § 61.145, 40 C.F.R. § 61.148, and 40 C.F.R. § 61.150. The permittee, owner, or operator must notify the Secretary at least ten (10) working days prior to the commencement of any asbestos removal on the forms prescribed by the Secretary if the permittee is subject to the notification requirements of 40 C.F.R. § 61.145(b)(3)(i). The USEPA, the Division of Waste Management and the Bureau for Public Health - Environmental Health require a copy of this notice to be sent to them. [40 C.F.R. §61.145(b) and 45CSR34]
- 3.1.4. **Odor.** No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor at any location occupied by the public. [45CSR§4-3.1 State-Enforceable only.]
- 3.1.5. **Standby plan for reducing emissions.** When requested by the Secretary, the permittee shall prepare standby plans for reducing the emissions of air pollutants in accordance with the objectives set forth in Tables I, II, and III of 45CSR11. [45CSR§11-5.2]
- 3.1.6. **Emission inventory.** The permittee is responsible for submitting, on an annual basis, an emission inventory in accordance with the submittal requirements of the Division of Air Quality. [W.Va. Code § 22-5-4(a)(14)]
- 3.1.7. **Ozone-depleting substances.** For those facilities performing maintenance, service, repair or disposal of appliances, the permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 C.F.R. Part 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B:
- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the prohibitions and required practices pursuant to 40 C.F.R. §§ 82.154 and 82.156.
 - b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 C.F.R. § 82.158.
 - c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 C.F.R. § 82.161.
- [40 C.F.R. 82, Subpart F]

- 3.1.8. **Risk Management Plan.** This stationary source, as defined in 40 C.F.R. § 68.3, is subject to Part 68. This stationary source shall submit a risk management plan (RMP) by the date specified in 40 C.F.R. Part 68.10. This stationary source shall certify compliance with the requirements of Part 68 as part of the annual compliance certification as required by 40 C.F.R. Part 70 or 71.

[40 C.F.R. 68]

- 3.1.9. **45CSR21.** The permittee shall comply with all hourly and annual emission limits set forth by the affected 45CSR13 permits, for each of the sources and associated emission points identified in Attachment A of Permit R13-2617 (Appendix B of this Permit).

Note: For the Polyvinyl Butyral Production Area, the affected permit is R13-2380, and the Attachment A listing only for those sources in the Polyvinyl Butyral Production Area is provided in Appendix B.

[45CSR13, R13-2617, 4.1.1]

- 3.1.10. **45CSR21.** The permitted sources identified in Appendix B and recognized as being subject to 45CSR21 shall comply with all applicable requirements of 45CSR21 – “Regulation to Prevent and Control Air Pollution from the Emission of Volatile Organic Compounds” provided, however, that compliance with any more stringent requirements under the affected 45CSR13 permit identified in Appendix B, are also demonstrated. The applicable requirements set forth by 45CSR21 shall include, but not be limited to, the following: **[45CSR13, R13-2617, 4.1.2]**

3.1.10.1. The permittee shall maintain the aggregated hourly and annual VOC control efficiency of 90% or greater, on a site-wide basis, for all existing sources listed or required to be listed as part of the original facility-wide Reasonably Available Control Measures (RACM) plan, as identified in Appendix B. **[45CSR13, R13-2617, 4.1.2.1; 45CSR§21-40.3.a.1 (State-Enforceable only)]**

3.1.10.2. On or after May 1, 1996, construction or modification of any emission source resulting in a maximum theoretical emissions (MTE) of VOCs equaling or exceeding six (6) pounds per hour and not listed or required to be listed in the facility-wide RACM plan shall require the prior approval by the Director of an emission control plan that meets the definition of reasonable available control technology (RACT) on a case-by-case basis for both fugitive and non-fugitive VOC emissions from such source. All sources constructed or modified on or after May 1, 1996 shall be subject to the following: **[45CSR13, R13-2617, 4.1.2.2; 45CSR§21-40.3.c (State-Enforceable only)]**

a. The RACT control plan(s) shall be embodied in a permit in accordance to 45CSR13. **[45CSR13, R13-2617, 4.1.2.2.a; 45CSR§21-40.4.e (State-Enforceable only)]**

b. The MTE and associated emission reductions of the constructed or modified source will not be calculated into the site-wide aggregate hourly and annual emissions reduction requirements set forth in Section 3.1.10.1. **[45CSR13, R13-2617, 4.1.2.2.b]**

3.1.10.3. If a modification to an existing source with current MTE below the threshold of six (6) pounds per hour of VOCs causes an increase in the MTE that results in the source exceeding the six (6) pounds per hour threshold for the first time, the source shall be subject to RACT in accordance to Section 3.1.10.2. **[45CSR13, R13-2617, 4.1.2.3; 45CSR§21-40.3.c (State-Enforceable only)]**

3.1.10.4. Physical changes to or changes in the method of operation of an existing emission source listed or required to be listed as part of the facility-wide RACM plan, that results in an increase in VOC emissions of any amount, shall require the prior approval by the Director of an emission control plan that meets the definition of RACT on a case-by-case basis for both fugitive and non-fugitive VOC emissions from the source. All sources modified on or after May 1, 1996 shall be subject to the following: **[45CSR13, R13-2617, 4.1.2.4; 45CSR§21-40.3.c (State-Enforceable only)]**

- a. The RACT control plan (s) shall be embodied in a permit in accordance to 45CSR13. **[45CSR13, R13-2617, 4.1.2.4.a; 45CSR§21-40.4.e (State-Enforceable only)]**
 - b. The facility-wide RACM plan shall be modified to include the RACT analysis conducted on the modified source(s). **[45CSR13, R13-2617, 4.1.2.4.b]**
 - c. The MTE and associated emission reductions of the modified source shall be recalculated as part of the site-wide aggregate hourly and annual emissions reduction requirements to demonstrate compliance with the minimum 90% reduction rate as set forth in 3.1.10.1 of this permit. **[45CSR13, R13-2617, 4.1.2.4.c]**
- 3.1.10.5. In the event the facility-wide RACM plan is modified to delete an existing emission source, and any associated pollution control equipment, due to the source being permanently removed from service or reassigned to service not subject to the requirements of 45CSR§21-40, the MTE shall be recalculated to demonstrate that the 90% facility-wide VOC reduction requirement set forth in Section 3.1.10.1 is still being met. In the event such a modification results in the site-wide aggregate hourly and annual emissions reduction being recalculated to a rate less than 90%, the RACM plan shall be revised to include all new and/or modified sources and their associated control technologies constructed on or after May 1, 1996, in order to meet the requirements set forth in 3.1.10.1. **[45CSR13, R13-2617, 4.1.2.5]**
- 3.1.10.6. In the event a source and associated emission point identified in Appendix B is subject to the New Source Performance Standards (NSPS) of 40 C.F.R. 60, the National Emission Standards for Hazardous Air Pollutants (NESHAP) of 40 C.F.R. 61, or the Maximum Achievable Control Technology (MACT) standards of 40 C.F.R. 63, then compliance with such requirements as defined in the affected 45CSR13 permit shall demonstrate compliance with the RACT requirements set forth in R13-2617. **[45CSR13, R13-2617, 4.1.2.6]**
- Note: For the Polyvinyl Butyral Production Area, the affected permit is R13-2380, and the Attachment A listing only for those sources in the Polyvinyl Butyral Production Area is provided in Appendix B.
- 3.1.11. **45CSR27.** The permitted sources identified in Appendix B and recognized as being subject to 45CSR27 shall comply with all applicable requirements of 45CSR27 – “To Prevent and Control the Emissions of Toxic Air Pollutants” provided, however, that compliance with any more stringent requirements under the affected 45CSR13 permit identified in Appendix B are also demonstrated. The applicable requirements set forth by 45CSR27 shall include, but not be limited to, the following: **[45CSR13, R13-2617, 4.1.3]**
- 3.1.11.1. The permittee shall employ the best available technology (BAT) for the purpose of reducing toxic air pollutants (TAP) associated with the applicable sources and emission points identified in Appendix B. **[45CSR13, R13-2617, 4.1.3.1; 45CSR§27-3.1 (State-Enforceable only)]**
- 3.1.11.2. The permittee shall employ BAT for the purpose of preventing and controlling fugitive emissions of TAP to the atmosphere as a result of routing leakage from those sources and their associated equipment identified in Appendix B as operating in TAP service. **[45CSR13, R13-2617, 4.1.3.2; 45CSR§27-4.1 (State-Enforceable only)]**
- Note: For the Polyvinyl Butyral Production Area, the affected permit is R13-2380, and the Attachment A listing only for those sources in the Polyvinyl Butyral Production Area is provided in Appendix B.

- 3.1.12. **45CSR27.** In the event a source and associated emission point identified in Appendix B are subject to the MACT standards of 40 C.F.R. 63, then compliance with the applicable MACT requirements identified in the affected 45CSR13 permit shall demonstrate compliance with the BAT requirements set forth in 3.1.11.

Note: For the Polyvinyl Butyral Production Area, the affected permit is R13-2380, and the Attachment A listing only for those sources in the Polyvinyl Butyral Production Area is provided in Appendix B.

[45CSR13, R13-2617, 4.1.4; 45CSR§27-3.1 (State-Enforceable only)]

- 3.1.13. **Operation and Maintenance of Air Pollution Control Equipment.** The permittee shall, to the extent practicable, install, maintain, and operate Scrubbers B08A and B08B, and associated monitoring equipment in a manner consistent with safety and good air pollution control practices for minimizing emissions, or comply with any more stringent limits set forth in this permit or as set forth by any State rule, Federal regulation, or alternative control plan approved by the Secretary. **[45CSR§13-5.11.; 45CSR13, R13-2617, 4.1.5 and R13-2380, 4.1.20]**

3.2. Monitoring Requirements

- 3.2.1. **45CSR21.** The permittee shall implement and maintain leak detection and repair (LDAR) programs for the reduction of fugitive VOC emissions in all manufacturing process units subject to 45CSR§21-40 producing a product or products intermediate or final, in excess of 1,000 megagrams (1,100 tons) per year in accordance with the applicable methods and criteria of 45CSR§21-37 or alternate procedures approved by the Director. Procedures approved by the Director, 40 C.F.R. 60, Subpart VV, 40 C.F.R. 61, Subpart V, 40 C.F.R. 63, Subpart H, 40 C.F.R. 63, Subpart TT, 40 C.F.R. 63, Subpart UU, 40 C.F.R. 65, Subpart F, and 40 C.F.R. 265, Subpart CC. This requirement shall apply to all units identified in Appendix B irrespective of whether or not such units produce as intermediates or final products, substances on the lists contained with 40 C.F.R. 60, 40 C.F.R. 61, or 40 C.F.R. 63.

Note: The Attachment A listing only for those sources in the Polyvinyl Butyral Production Area is provided in Appendix B.

[45CSR13, R13-2617, 4.2.1; 45CSR§21-40.3.a.2 (State-Enforceable only)]

- 3.2.2. **45CSR27.** The permittee shall implement and maintain a LDAR program for the applicable sources and emission points identified in Appendix B in order to reduce the emissions of TAP in accordance with the requirements of 40 C.F.R. 63, Subpart H – “National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks.” Compliance with 40 C.F.R. 63, Subpart H shall be considered demonstration of compliance with the provisions of 45CSR§27-4 – “Fugitive Emissions of Toxic Air Pollutants.”

Note: The Attachment A listing only for those sources in the Polyvinyl Butyral Production Area is provided in Appendix B.

[45CSR13, R13-2617, 4.2.2; 45CSR§27-4.1 (State-Enforceable only)]

- 3.2.3. **45CSR21.** In the event a source and associated emission point identified in Appendix B are subject to the MACT standards of 40 C.F.R. 63, then compliance with any applicable LDAR program set forth by the MACT and identified in the affected 45CSR13 permit shall demonstrate compliance with the monitoring requirements set forth in this permit.

Note: For the Polyvinyl Butyral Production Area, the affected permit is R13-2380, and the Attachment A listing only for those sources in the Polyvinyl Butyral Production Area is provided in Appendix B.

[45CSR13, R13-2617, 4.2.3; 45CSR§21-37.1.c (State-Enforceable only); 45CSR§27-4.1 (State-Enforceable only)]

3.3. Testing Requirements

- 3.3.1. **Stack testing.** As per provisions set forth in this permit or as otherwise required by the Secretary, in accordance with the West Virginia Code, underlying regulations, permits and orders, the permittee shall conduct test(s) to determine compliance with the emission limitations set forth in this permit and/or established or set forth in underlying documents. The Secretary, or his duly authorized representative, may at his option witness or conduct such test(s). Should the Secretary exercise his option to conduct such test(s), the operator shall provide all necessary sampling connections and sampling ports to be located in such manner as the Secretary may require, power for test equipment and the required safety equipment, such as scaffolding, railings and ladders, to comply with generally accepted good safety practices. Such tests shall be conducted in accordance with the methods and procedures set forth in this permit or as otherwise approved or specified by the Secretary in accordance with the following:
- a. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with 40 C.F.R. Parts 60, 61, and 63, if applicable, in accordance with the Secretary's delegated authority and any established equivalency determination methods which are applicable.
 - b. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with applicable requirements which do not involve federal delegation. In specifying or approving such alternative testing to the test methods, the Secretary, to the extent possible, shall utilize the same equivalency criteria as would be used in approving such changes under Section 3.3.1.a. of this permit.
 - c. All periodic tests to determine mass emission limits from or air pollutant concentrations in discharge stacks and such other tests as specified in this permit shall be conducted in accordance with an approved test protocol. Unless previously approved, such protocols shall be submitted to the Secretary in writing at least thirty (30) days prior to any testing and shall contain the information set forth by the Secretary. In addition, the permittee shall notify the Secretary at least fifteen (15) days prior to any testing so the Secretary may have the opportunity to observe such tests. This notification shall include the actual date and time during which the test will be conducted and, if appropriate, verification that the tests will fully conform to a referenced protocol previously approved by the Secretary.

[WV Code § 22-5-4(a)(15) and 45CSR13]

- 3.3.2. **45CSR21.** Manufacturing process units may be exempted upon written request of the permittee to the Director. Exempted units are exempted from the frequency of testing as described in 45CSR§21-37, however, LDAR testing of this unit or certification of emission using approved fugitive emission factors will be required every three years, or upon request by the Director or his duly authorized representative. Waiver or scheduling of LDAR testing every three years may be granted by the Director if written request and justification are submitted by the permittee. Units exempted from testing are not exempted from testing which may be required under any other applicable State or Federal regulations, orders, or permits. The Director may periodically require verifications by the permittee that maintenance and repair procedures associated with approved exemptions are continued and practiced.

[45CSR13, R13-2617, 4.3.1; 45CSR§21-40.3.a.2 (State-Enforceable only)]

- 3.3.3. **45CSR21.** In the event a source and associated emission point identified in Appendix B are subject to the MACT standards of 40 C.F.R. 63, then compliance with the applicable LDAR testing requirements set forth by the MACT and identified in the affected 45CSR13 permit shall demonstrate compliance with the LDAR testing requirements set forth in this permit.

Note: For the Polyvinyl Butyral Production Area, the affected permit is R13-2380, and the Attachment A listing only for those sources in the Polyvinyl Butyral Production Area is provided in Appendix B.

[45CSR13, R13-2617, 4.3.2; 45CSR§21-37.1.c (State-Enforceable only); 45CSR§27-4.1 (State-Enforceable only)]

3.4. Recordkeeping Requirements

- 3.4.1. **Monitoring information.** The permittee shall keep records of monitoring information that include the following:
- a. The date, place as defined in this permit and time of sampling or measurements;
 - b. The date(s) analyses were performed;
 - c. The company or entity that performed the analyses;
 - d. The analytical techniques or methods used;
 - e. The results of the analyses; and
 - f. The operating conditions existing at the time of sampling or measurement.

[45CSR§30-5.1.c.2.A.; 45CSR13, R13-2617, 4.4.1 and R13-2380, 4.4.1]

- 3.4.2. **Retention of records.** The permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of monitoring sample, measurement, report, application, or record creation date. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Where appropriate, records may be maintained in computerized form in lieu of the above records. **[45CSR§30-5.1.c.2.B.]**

- 3.4.3. **Odors.** For the purposes of 45CSR4, the permittee shall maintain a record of all odor complaints received, any investigation performed in response to such a complaint, and any responsive action(s) taken.

[45CSR§30-5.1.c. State-Enforceable only.]

- 3.4.4. **Record of Maintenance of Air Pollution Control Equipment.** For Scrubbers B08A and B08B, the permittee shall maintain accurate records of all required pollution control equipment inspection and/or preventative maintenance procedures.

[45CSR13, R13-2617, 4.4.2 and R13-2380, 4.4.2]

- 3.4.5. **Records of Malfunctions of Air Pollution Control Equipment.** For Scrubbers B08A and B08B, the permittee shall maintain records of the occurrence and duration of any malfunction or operational shutdown of the air pollution control equipment during which excess emissions occur. For each such case, the following information shall be recorded:

- a. The equipment involved.
- b. Steps taken to minimize emissions during the event.
- c. The duration of the event.
- d. The estimated increase in emissions during the event.

For each such case associated with an equipment malfunction, the additional information shall also be recorded:

- e. The cause of the malfunction.
- f. Steps taken to correct the malfunction.
- g. Any changes or modifications to equipment or procedures that would help prevent future recurrences of the malfunction.

[45CSR13, R13-2617, 4.4.3 and R13-2380, 4.4.3]

- 3.4.6. **45CSR21.** Unless granted a variance pursuant to 45CSR§21-9.3, or as approved by the Director as part of a required Start-up, Shutdown, and Malfunction (SSM) Plan mandated under 40 C.F.R. §63.6(e) or another applicable Section of 40 C.F.R. 63, the owner or operator of the facility shall operate all emission control equipment listed Appendix B as part of the facility-wide control efficiency plan at all times the facilities are in operation or VOC emissions are occurring from these sources or activities. In the event of a malfunction, and a variance has not been granted, the production unit shall be shutdown or the activity discontinued as expeditiously as possible. The permittee shall comply with 45CSR§21-9.3 with respect to all periods of non-compliance with the emission limitations set forth in the affected 45CSR13 permits and the emissions reduction requests set forth in the facility-wide control efficiency plan resulting from unavoidable malfunctions of equipment.

Note: For the Polyvinyl Butyral Production Area, the affected permit is R13-2380, and the Attachment A listing only for those sources in the Polyvinyl Butyral Production Area is provided in Appendix B.

[45CSR13, R13-2617, 4.4.4]

- 3.4.7. **45CSR27.** The permittee shall maintain records of the results of all monitoring and inspections, emission control measures applied, and the nature, timing, and results of repair efforts conducted in accordance to 45CSR§27-10 and set forth in the affected 45CSR13 permits as identified in Appendix B.

Note: For the Polyvinyl Butyral Production Area, the affected permit is R13-2380, and the Attachment A listing only for those sources in the Polyvinyl Butyral Production Area is provided in Appendix B.

[45CSR13, R13-2617, 4.4.5.]

3.5. Reporting Requirements

- 3.5.1. **Responsible official.** Any application form, report, or compliance certification required by this permit to be submitted to the DAQ and/or USEPA shall contain a certification by the responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

[45CSR§§30-4.4. and 5.1.c.3.D.]

- 3.5.2. A permittee may request confidential treatment for the submission of reporting required under 45CSR§30-5.1.c.3. pursuant to the limitations and procedures of W.Va. Code § 22-5-10 and 45CSR31.

[45CSR§30-5.1.c.3.E.]

- 3.5.3. Except for the electronic submittal of the annual certification to the USEPA as required in 3.5.5 below, all notices, requests, demands, submissions and other communications required or permitted to be made to the Secretary of DEP and/or USEPA shall be made in writing and shall be deemed to have been duly given when delivered by hand, mailed first class or by private carrier with postage prepaid to the address(es) set forth below or to such other person or address as the Secretary of the Department of Environmental Protection may designate:

If to the DAQ:

Director
WVDEP
Division of Air Quality
601 57th Street SE
Charleston, WV 25304

Phone: 304/926-0475
FAX: 304/926-0478

If to the US EPA:

Associate Director
Office of Enforcement and Permits Review
(3AP12)
U. S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

- 3.5.4. **Certified emissions statement.** The permittee shall submit a certified emissions statement and pay fees on an annual basis in accordance with the submittal requirements of the Division of Air Quality.

[45CSR§30-8.]

- 3.5.5. **Compliance certification.** The permittee shall certify compliance with the conditions of this permit on the forms provided by the DAQ. In addition to the annual compliance certification, the permittee may be required to submit certifications more frequently under an applicable requirement of this permit. The annual certification shall be submitted to the DAQ and USEPA on or before March 15 of each year, and shall certify compliance for

the period ending December 31. The annual certification to the USEPA shall be submitted in electronic format only. It shall be submitted by e-mail to the following address: R3_APD_Permits@epa.gov. The permittee shall maintain a copy of the certification on site for five (5) years from submittal of the certification.

[45CSR§30-5.3.e.]

- 3.5.6. **Semi-annual monitoring reports.** The permittee shall submit reports of any required monitoring on or before September 15 for the reporting period January 1 to June 30 and on or before March 15 for the reporting period July 1 to December 31. All instances of deviation from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official consistent with 45CSR§30-4.4.

[45CSR§30-5.1.c.3.A.]

- 3.5.7. **Emergencies.** For reporting emergency situations, refer to Section 2.17 of this permit.

- 3.5.8. **Deviations.**

- a. In addition to monitoring reports required by this permit, the permittee shall promptly submit supplemental reports and notices in accordance with the following:

1. Any deviation resulting from an emergency or upset condition, as defined in 45CSR§30-5.7., shall be reported by telephone or telefax within one (1) working day of the date on which the permittee becomes aware of the deviation, if the permittee desires to assert the affirmative defense in accordance with 45CSR§30-5.7. A written report of such deviation, which shall include the probable cause of such deviations, and any corrective actions or preventative measures taken, shall be submitted and certified by a responsible official within ten (10) days of the deviation.
2. Any deviation that poses an imminent and substantial danger to public health, safety, or the environment shall be reported to the Secretary immediately by telephone or telefax. A written report of such deviation, which shall include the probable cause of such deviation, and any corrective actions or preventative measures taken, shall be submitted by the responsible official within ten (10) days of the deviation.
3. Deviations for which more frequent reporting is required under this permit shall be reported on the more frequent basis.
4. All reports of deviations shall identify the probable cause of the deviation and any corrective actions or preventative measures taken.

[45CSR§30-5.1.c.3.C.]

- b. The permittee shall, in the reporting of deviations from permit requirements, including those attributable to upset conditions as defined in this permit, report the probable cause of such deviations and any corrective actions or preventive measures taken in accordance with any rules of the Secretary.

[45CSR§30-5.1.c.3.B.]

- 3.5.9. **New applicable requirements.** If any applicable requirement is promulgated during the term of this permit, the permittee will meet such requirements on a timely basis, or in accordance with a more detailed schedule if required by the applicable requirement.

[45CSR§30-4.3.h.1.B.]

- 3.5.10. **Suspension of Operations.** In the event the permittee should deem it necessary to suspend, for a period in excess of sixty (60) consecutive calendar days, the operations, either in whole or in part, authorized by a permit issued under 45CSR13, the permittee shall notify the Secretary, in writing, within two (2) calendar weeks of the passing of the sixtieth (60) day of the suspension period. **[45CSR13, R13-2380D, 2.14]**
- 3.5.11. **45CSR21.** The permittee shall submit to the DAQ a plan for complete, facility-wide implementation of RACT requirements within one hundred eighty (180) days of notification by the Director that a violation of the National Ambient Air Quality Standards (NAAQS) for ozone (that were in effect on or before May 1, 1996) has occurred. Such plan shall include those sources listed in Appendix B as part of the site-wide control efficiency requirement and may contain an update of existing RACT analyses. Full implementation of such plan shall be completed within two (2) years of approval of the RACT plan by the Director.

Note: The Attachment A listing only for those sources in the Polyvinyl Butyral Production Area is provided in Appendix B.

[45CSR13, R13-2617, 4.5.1; 45CSR§40.4.c.1 (State-Enforceable only)]

3.6. Compliance Plan

- 3.6.1. None.

3.7. Permit Shield

- 3.7.1. The permittee is hereby granted a permit shield in accordance with 45CSR§30-5.6. The permit shield applies provided the permittee operates in accordance with the information contained within this permit.
- 3.7.2. The following requirements specifically identified are not applicable to the source based on the determinations set forth below. The permit shield shall apply to the following requirements provided the conditions of the determinations are met.
- a. 40 C.F.R. 60, Subpart K - "Standards of Performance For Storage Vessels For Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978." There are no petroleum liquid storage tanks in the Polyvinyl Butyral Production Area.
 - b. 40 C.F.R. 60, Subpart Ka - "Standards of Performance for Storage Vessels For Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984." There are no petroleum liquid storage tanks in the Polyvinyl Butyral Production Area.
 - c. 40 C.F.R. 60, Subpart Kb - "Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984." There are no volatile organic liquid storage tanks in the Polyvinyl Butyral Production Area constructed after July 23, 1984 with a design capacity equal to or greater than 75 cubic meters (m³).
 - d. 40 C.F.R. 60, Subpart VV - "Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry." The Polyvinyl Butyral Production Area does not produce as intermediates or final products any of the materials listed in 40 C.F.R. §60.489.

- e. 40 C.F.R. 60, Subpart DDD - “Standards of Performance for Volatile Organic Compound (VOC) Emissions from the Polymer Manufacturing Industry.” The Polyvinyl Butyral Production Area does not manufacture polypropylene, polyethylene, polystyrene, or poly (ethylene terephthalate) for which this rule applies.
- f. 40 C.F.R. 60, Subpart HHH – “Standards of Performance for Synthetic Fiber Production Facilities.” The Polyvinyl Butyral Production Area does not operate a solvent-spun synthetic fiber process as defined by 40 C.F.R. §60.601.
- g. 40 C.F.R. 60, Subpart RRR - “Standards of Performance for Volatile Organic Compound (VOC) Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Reactor Processes.” The Polyvinyl Butyral Production Area utilizes batch processes which in accordance with 40 C.F.R. §60.700(c)(1) are not subject to this regulation.
- h. 40 C.F.R. 61, Subpart V - “National Emission Standards for Equipment Leaks (Fugitive Emissions Sources).” Applies to sources in VHAP service as defined in 40 C.F.R. §61.241. VHAP service involves chemicals that are not used in a manner that qualifies them under the rule in the Polyvinyl Butyral Production Area.
- i. 40 C.F.R. 63, Subpart H - “National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks.” 40 C.F.R. 63 Subparts F, G, and H do not apply to manufacturing process units that do not meet the criteria in 40 C.F.R. §§63.100(b)(1), (b)(2), and (b)(3).
- j. 40 C.F.R. 63, Subpart KK – “National Emission Standards for the Printing and Publishing Industry.” The Polyvinyl Butyral Production Area was subject to the requirements of 40 C.F.R. 63, Subpart KK, but has ceased operations of the facilities that were covered under this MACT standard.
- k. 40 C.F.R. 63, Subpart JJJ - “National Emission Standards for Hazardous Air Pollutant Emissions: Group IV Polymers and Resins.” The Polyvinyl Butyral Production Area does not produce the materials listed in 40 C.F.R. §63.1310.
- l. 40 C.F.R. 63, Subpart MMMM - “National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products.” The Polyvinyl Butyral Production Area is not a miscellaneous metal parts and products surface coating facility, as defined by 40 C.F.R. §63.3881, and therefore is not subject to this rule.
- m. 40 C.F.R. 63, Subpart OOOO – “National Emission Standards for Hazardous Air Pollutants: Printing, Coating, and Dyeing of Fabrics and Other Textiles.” The Polyvinyl Butyral Production Area does not have an operation for printing, coating, slashing, dyeing or finishing of fabric and other textiles as defined in 40 C.F.R. §63.4281.
- n. 40 C.F.R. 63, Subpart PPPP – “National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products.” The Polyvinyl Butyral Production Area does not produce an intermediate or final product that meets the definition of “surface coated” plastic part.

- o. 40 C.F.R. 63, Subpart WWW - “National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production.” The Polyvinyl Butyral Production Area does not engage in reinforced plastics composites production as defined in 40 C.F.R. §63.5785 and does not manufacture composite material as defined in 40 C.F.R. §63.5935.
- p. 40 C.F.R. 63, Subpart HHHHH – “National Emission Standards for Hazardous Air Pollutants: Miscellaneous Coating Manufacturing.” The Polyvinyl Butyral Production Area does not produce, blend, or manufacture coatings as part of the manufacturing process.
- q. 40 C.F.R. 82, Subpart B - “Protection of Stratospheric Ozone.” Requires recycling of Chlorofluorocarbons (CFCs) from motor vehicles and that technicians servicing equipment need to be licensed. The Polyvinyl Butyral Production Area does not conduct motor vehicle maintenance involving CFCs on site.
- r. 40 C.F.R. 82, Subpart C – “Protection of Stratospheric Ozone.” Bans non-essential products containing Class I substances and bans non-essential products containing or manufactured with Class II substances. The Polyvinyl Butyral Production Area does not use, manufacture, nor distribute these materials.
- s. 45CSR2 – “To Prevent and Control Particulate Air Pollution from Combustion of Fuel in Indirect Heat Exchangers.” The Polyvinyl Butyral Production Area does not contain any fuel burning units regulated under this rule.
- t. 45CSR§6-4 – “To Prevent and Control Air Pollution from Combustion of Refuse: Emission Standards for Incinerators and Incineration.” The Polyvinyl Butyral Production Area does not operate any incinerators as defined by 45CSR§6-2.8.
- u. 45CSR10 – “To Prevent and Control Air Pollution from the Emission of Sulfur Oxides.” The Polyvinyl Butyral Production Area does not have emission sources of sulfur oxides subject to this rule.
- v. 45CSR16 – “Standards of Performance for New Stationary Sources Pursuant to 40 C.F.R. 60.” The Polyvinyl Butyral Production Area is not subject to any requirements under 40 C.F.R. 60.
- w. 45CSR17 – “To Prevent and Control Particulate Matter Air Pollution from Materials Handling, Preparation, Storage and Other Sources of Fugitive Particulate Matter.” Per 45CSR§17-6.1, the Polyvinyl Butyral Production Area is not subject to 45CSR17 because it is subject to the fugitive particulate matter emission requirements of 45CSR7.
- x. 45CSR27 – “To Prevent and Control the Emission of Toxic Air Pollutants.” The Polyvinyl Butyral Production Area does not have emission sources of toxic air pollutants as listed in 45CSR27.

4.0 Source-Specific Requirements [PVB Production]

4.1. Limitations and Standards

4.1.1. Emissions from the permitted process shall not exceed the hourly or annual limitations listed in Table 4.1.1.

Table 4.1.1.

Emission Point ID #	Pollutant	Emission Limitations	
		(lb/hr)	(ton/yr)
PVA Unloading Vents			
B01	HAP (MeOH, 67-56-1)	2.15	1.73
B01A	HAP (MeOH, 67-56-1)	0.44	
B01B	HAP (MeOH, 67-56-1)	0.44	
B01C	HAP (MeOH, 67-56-1)	0.56	0.48
B01	Particulate Matter	2.17	2.37
B01A	Particulate Matter	2.17	2.37
B01B	Particulate Matter	2.17	
B01C	Particulate Matter	2.91	2.37
PVA Dissolving Vents			
B02A	HAP (MeOH, 67-56-1)	0.10	0.08
B02B	HAP (MeOH, 67-56-1)	0.10	
B02C	HAP (MeOH, 67-56-1)	0.11	0.08
PVB Reactors Clean Out Vents			
B07A	VOC	2.11	9.25
	HAP (MeOH, 67-56-1)	0.74	3.25
B07B	VOC	2.11	9.25
	HAP (MeOH, 67-56-1)	0.74	3.25
PVB Reactors Scrubber Vents			
B08A	VOC	0.50	2.17
	HAP (MeOH, 67-56-1)	0.01	0.01
B08B	VOC	0.50	2.17
	HAP (MeOH, 67-56-1)	0.01	0.01

Compliance with the above hourly particulate matter emission limits for emission points B01, B01A, B01B, and B01C shall demonstrate compliance with the less stringent 45CSR§7-4.1 hourly particulate matter emission limits. [45CSR13, R13-2380, 4.1.1; 45CSR§7-4.1]

4.1.2. The production of polyvinyl butyral resin produced in reactors B8-1 through B8-8 shall not exceed 30.5 F Units per hour or 311,400 F Units per year. [45CSR13, R13-2380, 4.1.2]

4.1.3. The leak detection and repair (LDAR) program, record keeping, monitoring, and minimum pollutant control equipment requirements set forth by Permit R13-2617C shall apply to this permit. [45CSR13, R13-2380, 4.1.3]

4.1.4. Water flow through the one-pass water scrubbers B08A and B08B shall be maintained at a minimum of 6 gallons per minute. [45CSR13, R13-2380, 4.1.4]

- 4.1.5. One nitrogen sparge and one reactor charge may be vented to each operating scrubber, equipment ID No.'s B08A and B08B, at any one time. **[45CSR13, R13-2380, 4.1.5]**
- 4.1.6. If one of the scrubbers should malfunction, or for any reason be rendered ineffective, all on-line reactors shall be vented through the remaining functional scrubber. Records of malfunctions shall be kept in accordance 4.4.2. **[45CSR13, R13-2380, 4.4.4]**
- 4.1.7. If both scrubbers should malfunction, or for any reason be rendered ineffective, the batches in progress shall be allowed to finish as long as the total unabated butyraldehyde emissions per scrubber remain less than 28 pounds per hour. The problem(s) with at least one of the malfunctioning scrubbers must be corrected before polyvinylbutyral (PVB) resin reactor batch operations can resume. **[45CSR13, R13-2380, 4.1.6]**
- 4.1.8. No person shall cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any process source operation which is greater than twenty (20) percent opacity. These provisions shall not apply to smoke and/or particulate matter emitted from any process source operation which is less than forty (40) percent opacity for any period or periods aggregating no more than five (5) minutes in any sixty (60) minute period. (B01, B01A, B01B, B01C, B30, B31, and B32A) **[45CSR13, R13-2380, 4.1.7; 45CSR§§7-3.1 and 3.2]**
- 4.1.9. No person shall cause, suffer, allow or permit any manufacturing process or storage structure generating fugitive particulate matter to operate that is not equipped with a system, which may include, but not be limited to, process equipment design, control equipment design or operation and maintenance procedures, to minimize the emissions of fugitive particulate matter. To minimize means such system shall be installed, maintained and operated to ensure the lowest fugitive particulate matter emissions reasonably achievable. **[45CSR13, R13-2380, 4.1.8; 45CSR§7-5.1]**
- 4.1.10. Due to unavoidable malfunction of equipment, emissions exceeding those set forth in 45CSR7 may be permitted by the Director for periods not to exceed ten (10) days upon specific application to the Director. Such application shall be made within twenty-four (24) hours of the malfunction. In cases of major equipment failure, additional time periods may be granted by the Director provided a corrective program has been submitted by the owner or operator and approved by the Director. **[45CSR13, R13-2380, 4.1.9; 45CSR§7-9.1]**
- 4.1.11. The permittee shall comply with all applicable requirements of the "MON MACT" (40 C.F.R. 63, Subpart FFFF; 40 C.F.R. §63.2435) according to the Group designations below:
 - a. MCPU-1, PVA Dissolving
 - 1. Group 2 batch process vents: B01A, B01B, B01C, B02A, B02B, and B02C.
 - 2. Maintenance wastewater stream
 - b. MCPU-2, PVA Reaction
 - 1. Group 1 batch process vents: B08A and B08B.
 - 2. Maintenance wastewater stream
 - 3. Process wastewater stream

[45CSR13, R13-2380, 4.1.10]

4.1.12. The permittee shall be in compliance with the emission limits and work practice standards in Table 2 (Batch Process Vents) and Table 7 (Wastewater Streams) of 40 C.F.R. 63, Subpart FFFF at all times, except during periods of startup, shutdown, and malfunction (SSM). **[45CSR13, R13-2380, 4.1.11; 45CSR34; 40 C.F.R. §63.2450(a)]**

4.1.13. For the One-Pass Water Scrubbers B08A and B08B, the permittee shall:

- a. Meet the requirements of 40 C.F.R. §63.982(c) (Subpart SS) and the requirements referenced therein.
- b. Use a flow meter capable of providing a continuous record of the absorber influent water flow.
- c. Determine Nitrogen flow using one of the procedures specified in 40 C.F.R. §§63.994(c)(1)(ii)(A) through (D).
- d. Record the ratio of vapor flow to scrubber water flow over the time period of any performance test.

Note: From the Notification of Compliance Status Report dated October 6, 2008, the water flow through the one-pass scrubbers B08A and B08B shall be maintained at a minimum of 6 gallons per minute and the 3-hour average of nitrogen flow to scrubber liquor flow during the purge step shall be maintained at or below 5.26 SCF/gal

[45CSR13, R13-2380, 4.1.12; 45CSR34; 40 C.F.R. §§63.2450(e), (k)(5), and §63.2460(c)]

4.1.14. The packed bed water scrubbers B08A and B08B shall be operated at all times when emissions are vented to them. **[45CSR13, R13-2380, 4.1.13; 45CSR34; 40 C.F.R. §63.990(a)(2)]**

4.1.15. The MCPU-2 process with Group 1 batch process vents B08A and B08B shall reduce collective uncontrolled organic HAP emissions from the sum of all batch process vents within the process by ≥ 98 percent by weight by venting emissions through the One-Pass Water Scrubbers B08A and B08B. **[45CSR13, R13-2380, 4.1.14; 45CSR34; 40 C.F.R. §63.2460(a); Table 2 to 40 C.F.R. 63, Subpart FFFF]**

4.1.16. The permittee shall develop a written startup, shutdown, and malfunction plan (SSMP) for the PVB Reactor Systems that describes, in detail, procedures for operating and maintaining the reactor systems during periods of startup, shutdown, and malfunction; and a program of correction action for malfunctioning process, air pollution control, and monitoring equipment used to comply with the relevant standard. The SSMP Plan shall cover the Group 1 Batch Process Vents B08A and B08B and the One-Pass Water Scrubbers B08A and B08B. **[45CSR13, R13-2380, 4.1.15; 45CSR34; 40 C.F.R. §63.6(e)(3)(i)]**

4.1.17. For MCPU-1 and MCPU-2, the permittee shall comply with the maintenance wastewater stream requirements in 40 C.F.R. §63.105 (40 C.F.R. 63, Subpart F) and the requirements referenced therein, except as specified in 40 C.F.R. §§63.2485(b) through (o). **[45CSR13, R13-2380, 4.1.16; 45CSR34; 40 C.F.R. §63.2485(a)]**

4.1.18. For MCPU-2, the permittee shall comply with the process wastewater stream requirements in 40 C.F.R. §§63.132 through 63.148 (40 C.F.R. 63, Subpart G) and the requirements referenced therein except as specified in 40 C.F.R. §§63.2485(b) through (o). **[45CSR13, R13-2380, 4.1.17; 45CSR34; 40 C.F.R. §63.2485(a)]**

4.1.19. The permittee must determine the annual average concentration and annual average flowrate for wastewater streams for MCPU-1 and MCPU-2. **[45CSR13, R13-2380, 4.1.18; 45CSR34; 40 C.F.R. §63.2485(j)]**

4.1.20. For MCPU-1 and MCPU-2, the permittee shall prepare a description of maintenance procedures for management of wastewaters generated from the emptying and purging of equipment in the process during temporary shutdowns for inspections, maintenance, and repair (i.e., a maintenance-turnaround) and during periods which are not shutdowns (i.e. routine maintenance). The descriptions shall:

- a. Specify the process equipment or maintenance tasks that are anticipated to create wastewater during maintenance activities.
- b. Specify the procedures that will be followed to properly manage the wastewater and control organic HAP emissions to the atmosphere; and
- c. Specify the procedures to be followed when clearing materials from process equipment.
- d. The permittee shall modify and update the information required by 4.1.20.a through 4.1.20.c as needed following each maintenance procedure based on the actions taken and the wastewaters generated in the preceding maintenance procedure.
- e. The permittee shall incorporate the procedures described in this section as part of the startup, shutdown, and malfunction plan.

[45CSR13, R13-2380, 4.1.19; 45CSR34; 40 C.F.R. §§63.105(b), (c), and (d)]

4.1.21. Emissions from the permitted process shall not exceed the following hourly and annual limitations:

Emission Source	Particulate Matter	
	lb/hr	ton/yr
Baghouse (B30)	1.0	4.38
Storage Silo (B31)	0.097	0.21
TOTAL	1.097	4.59

Compliance with the above hourly particulate matter emission limits shall demonstrate compliance with the less stringent 45CSR§7-4.1 hourly particulate matter emission limits for the B30 and B31.

[45CSR13, R13-1230, A.1; 45CSR§7-4.1]

4.1.22. No person shall cause, suffer, allow or permit particulate matter to be vented into the open air from any type source operation or duplicate source operation, or from all air pollution control equipment installed on any type source operation or duplicate source operation in excess of the quantity specified as follows:

Emission Point	45CSR7 Hourly Particulate Emission Limit pph
B32A	9.0

[45CSR§7-4.1.]

- 4.1.23. The owner or operator of a plant shall maintain particulate matter control of the plant premises, and plant owned, leased or controlled access roads, by paving, application of asphalt, chemical dust suppressants or other suitable dust control measures. Good operating practices shall be implemented and when necessary particulate matter suppressants shall be applied in relation to stockpiling and general material handling to minimize particulate matter generation and atmospheric entrainment. **[45CSR§7-5.2.]**
- 4.1.24. Any stack serving any process source operation or air pollution control equipment on any process source operation shall contain flow straightening devices or a vertical run of sufficient length to establish flow patterns consistent with acceptable stack sampling procedures. **[45CSR§7-4.12.]**

4.2. Monitoring Requirements

- 4.2.1. For the purpose of determining compliance with the opacity limits of 45CSR7 (Condition 4.1.8), the permittee shall conduct visible emission checks and / or opacity monitoring and recordkeeping for all emission sources subject to an opacity limit.
- a. The visible emission check shall determine the presence or absence of visible emissions. At a minimum, the observer must be trained and knowledgeable regarding the effects of background contrast, ambient lighting, observer position relative to lighting, wind, and the presence of uncombined water (condensing water vapor) on the visibility of emissions. This training may be obtained from written materials found in the References 1 and 2 from 40 C.F.R. 60, Appendix A, Method 22 or from the lecture portion of the 40 C.F.R. 60, Appendix A, Method 9 certification course.
 - b. Visible emission checks shall be conducted at least once per calendar month with a maximum of forty-five (45) days between consecutive readings. These checks shall be performed at each source (stack, transfer point, fugitive emission source, etc.) for a sufficient time interval, but no less than one (1) minute, to determine if any visible emissions are present. Visible emission checks shall be performed during periods of normal facility operation and appropriate weather conditions.
 - c. If visible emissions are present at a source(s) for three (3) consecutive monthly checks, the permittee shall conduct an opacity reading at that source(s) using the procedures and requirements of 45CSR7A as soon as practicable, but within seventy-two (72) hours of the final visual emission check. A 45CSR7A observation at a source(s) restarts the count of the number of consecutive readings with the presence of visible emissions.

[45CSR13, R13-2380, 4.2.1; 45CSR§30-5.1.c]

- 4.2.2. For the purpose of demonstrating compliance with the emissions limits in section 4.1.1 and demonstrating the Group 2 designation in section 4.1.11, the permittee shall monitor:
- a. The number of railcars unloaded (B01, B01A, B01B)
 - b. The number of batches produced in the PVA Dissolving System (B01C, B01D, B02A, B02B, B02C)

[45CSR13, R13-2380, 4.2.2]

- 4.2.3. For the purpose of demonstrating compliance with Sections 4.1.12, 4.1.13, and 4.1.15 for the One-Pass water scrubbers B08A and B08B, the permittee shall monitor and maintain 3-hour average of nitrogen flow to scrubber liquor flow during the purge step at or below 5.26 SCF/gal.

[45CSR13, R13-2380, 4.2.3]

- 4.2.4. The permittee shall follow the SSM Plan that is required by Section 4.1.16 of this permit.

[45CSR13, R13-2380, 4.2.4]

4.3. Testing Requirements

- 4.3.1. At such reasonable times as the Director may designate, the operator of any manufacturing process source operation may be required to conduct or have conducted stack tests to determine the particulate matter loading in exhaust gases. Such tests shall be conducted in such manner as the Director may specify and be filed on forms and in a manner acceptable to the Director. The Director, or his duly authorized representative, may at his option witness or conduct such stack tests. Should the Director exercise his option to conduct such tests, the operator will provide all the necessary sampling connections and sampling ports to be located in such manner as the Director may require, power for test equipment and the required safety equipment such as scaffolding, railings, and ladders to comply with generally accepted good safety practices. **[45CSR§7-8.1]**

- 4.3.2. The Director, or his duly authorized representative, may conduct such other tests as he or she may deem necessary to evaluate air pollution emissions. **[45CSR§7-8.2]**

4.4. Recordkeeping Requirements

- 4.4.1. For the purpose of determining compliance with permit limits set forth in 4.1.1, the permittee shall maintain records on a quarterly and annual basis. These documents shall record F Units of product produced monthly on each set of four (4) reactors, Reactors B8-1 through B8-4 and Reactors B8-5 through B8-8. Example log sheets are supplied in Appendix A of this permit. Records shall be maintained according to the requirements of 40 C.F.R. §63.10(b)(1). Such records shall be certified by a "Responsible Official" and made available to the Director or his duly authorized representative upon request. **[45CSR13, R13-2380, 4.4.5]**

- 4.4.2. Records, as required by 4.1.6, shall be kept of all malfunctions that indicate which reactors are being utilized as well as their throughput and hours operated while venting to the remaining scrubber. Requirement 4.1.4 shall still apply to the functional scrubber. Records shall be maintained according to the requirements of 40 C.F.R. §63.10(b)(1). Such records shall be certified by a "Responsible Official" and made available to the Director or his duly authorized representative upon request. **[45CSR13, R13-2380, 4.4.4]**

- 4.4.3. The permittee shall maintain records of all monitoring data required by Section 4.2.1 documenting the date and time of each visible emission check, the emission point or equipment /source identification number, the name or means of identification of the observer, the results of the check(s), whether the visible emissions are normal for the process, and, if applicable, all corrective measures taken or planned. The permittee shall also record the general weather conditions (i.e. sunny, approximately 80°F, 6-10 mph NE wind) during the visual emission check(s). An example form is supplied in Appendix A. Should a visible emission observation be required to be performed per the requirements specified in 45CSR7A, the data records of each observation shall be maintained per the requirements of 45CSR7A. For an emission unit out of service during the normal monthly evaluation, the record of observation may note "out of service" (O/S) or equivalent. **[45CSR13, R13-2380, 4.4.6; 45CSR§30-5.1.c]**

4.4.4. The permittee shall meet the notification, reporting, and recordkeeping requirements specified in 40 C.F.R. §63.2525. **[45CSR13, R13-2380, 4.4.7; 45CSR34; 40 C.F.R. §63.2450(a)]**

4.4.5. The following records shall be maintained for the PVB Reactors B07A, B07B, B08A, and B08B:

- a. Record batches of PVB prepared each day.
- b. Calculate daily emissions of methanol and VOC.
- c. Calculate a rolling 365-day sums for emissions of methanol and VOC.
- d. Calculate the 365-day sums at least monthly.

[45CSR13, R13-2380, 4.4.8]

4.4.6. The permittee shall maintain records:

- a. Of the occurrence and duration of each start-up, shutdown, and malfunction of B08A and B08B vents and water scrubbers during which excess emissions (as defined in 40 C.F.R. 63, Subpart FFFF) occur. **[45CSR34; 40 C.F.R. §§63.998(d)(3)(i) and (c)(1)(ii)(D)]**
- b. For each SSM during which excess emissions occur, records that the procedures specified in the permittee's SSMP were followed, and documentation of actions taken that are not consistent with the plan. The records may take the form of a "checklist", or other form of recordkeeping that confirms conformance with the SSMP for the event. **[45CSR34; 40 C.F.R. §§63.998(d)(3)(ii) and (c)(1)(ii)(E)]**
- c. Documenting each start-up, shutdown, and malfunction. **[45CSR34; 40 C.F.R. §63.998(c)(1)(ii)(F)]**
- d. Of start-up, shutdown, and malfunction events that specify that there were no excess emissions during the event, as applicable. **[45CSR34; 40 C.F.R. §63.998(c)(1)(ii)(G)]**

[45CSR13, R13-2380, 4.4.9]

4.4.7. The permittee shall record the occurrences and the cause of periods when the monitored parameters for the Water Scrubbers B08A and B08B are outside of the parameter ranges documented in the Notification of Compliance Status report. This information shall also be reported in the Periodic Report. **[45CSR13, R13-2380, 4.4.10; 45CSR34; 40 C.F.R. §63.998(d)(5)]**

4.4.8. For the Railcar Unloading System B01, B01A, and B01B and for the PVA Dissolving System B01C, B01D, B02A, B02B, and B02C, the permittee shall maintain records as specified below:

- a. A record of the day each Dissolver batch was completed
- b. A record of whether each Dissolver batch was considered a standard or non-standard batch
- c. Daily rolling HAP emissions total for each day during which any Dissolver batch was produced. The daily calculation shall be done at least monthly to demonstrate emissions are less than 10,000 pounds per 365 day rolling period (use only days operated).

- d. Record pounds of PVA received and unloaded.
- e. Record batches of PVA slurry prepared each day.
- f. Calculate daily emissions of particulate, methanol, and VOC.
- g. Calculate rolling 365-day sums for emissions of particulate, methanol, and VOC.
- h. Calculate the 365-day sums at least monthly.

[45CSR13, R13-2380, 4.4.11; 45CSR34; 40 C.F.R. §63.2525(e)(4)]

- 4.4.9. For MCPU-1 and MCPU-2 Maintenance Wastewater Streams, the permittee shall maintain a record of the information required in Section 4.1.20 as part of the start-up, shutdown, and malfunction plan required under 40 C.F.R. §63.6(e)(3) of Subpart A. **[45CSR13, R13-2380, 4.4.12; 45CSR34; 40 C.F.R. §63.105(e)]**
- 4.4.10. For MCPU-2 Process Wastewater Streams, the permittee shall keep in a readily accessible location the records specified below:
 - a. Process unit identification and description of the process unit.
 - b. Stream identification code.
 - c. Concentration of Methanol in parts per million, by weight. Include documentation of the methodology used to determine concentration.
 - d. Flow rate in liter per minute.

[45CSR13, R13-2380, 4.4.13; 45CSR34; 40 C.F.R. §63.147(b)(8)]

- 4.4.11. For MCPU-2 Process Wastewater Streams, if the permittee uses process knowledge to determine the annual average concentration of a wastewater stream as specified in 40 C.F.R. §63.144(b)(3) and/or uses process knowledge to determine the annual average flow rate as specified in 40 C.F.R. §63.144(c)(1), and determines that the wastewater stream is not a Group 1 wastewater stream, the permittee shall keep in a readily accessible location the documentation of how process knowledge was used to determine the annual average concentration and/or the annual average flow rate of the wastewater stream. **[45CSR13, R13-2380, 4.4.14; 45CSR34; 40 C.F.R. §63.147(f)]**
- 4.4.12. The permittee shall maintain maintenance records for emission points B30 and B54 relating to the failure and/or repair of air pollution control devices and fugitive emissions control systems. Such records shall contain, at a minimum, the equipment ID number, a brief description of the equipment, the date of failure and/or repair, the nature of the problem, actions taken, and the name or initials of the person making the record entry. In the event of air pollution control equipment, fugitive emissions control system, or system failure, these records shall document the permittee's effort to maintain proper and effective operation of such equipment and/or systems. Records shall be maintained on site. Certified records, signed by a Responsible Official or an Authorized Representative shall be made available to the Secretary or a duly authorized representative upon request. **[45CSR§30-5.1.c.]**

- 4.4.13. The permittee shall maintain records indicating the use of any dust suppressants or any other suitable dust control measures as required by 4.1.23 applied at the facility. These records shall be maintained on site. **[45CSR§30-5.1.c.]**

4.5. Reporting Requirements

- 4.5.1. The permittee shall notify the Secretary, in writing, within fifteen (15) calendar days of the commencement of the construction, modification, or relocation activities authorized under permit R13-2380D. **[45CSR13, R13-2380, 4.5.1]**
- 4.5.2. Any violation(s) of the allowable visible emission requirement for any emission source discovered during observation using 45CSR7A must be reported in writing to the Director of the Division of Air Quality as soon as practicable, but within ten (10) calendar days, of the occurrence and shall include, at a minimum, the following information: the results of the visible determination of opacity of emissions, the cause or suspected cause of the violation(s), and any corrective measures taken or planned. **[45CSR13, R13-2380, 4.5.2; 45CSR§30-5.1.c]**
- 4.5.3. The term “periodic report” means “compliance report” for the purposes of 40 C.F.R. 63, Subpart FFFF. **[45CSR13, R13-2380, 4.5.3; 45CSR34; 40 C.F.R. §63.2450(m)]**
- 4.5.4. The permittee shall submit a compliance report semiannually according to the requirements below:
- a. The first compliance report must cover the period beginning on May 10, 2008 and ending on December 31, 2008.
 - b. The first compliance report must be postmarked or delivered no later than February 28, 2009.
 - c. Each subsequent compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.
 - d. Each subsequent compliance report must be postmarked or delivered no later than August 31 or February 28, whichever date is the first date following the end of the semiannual reporting period.

[45CSR13, R13-2380, 4.5.4; 45CSR34; 40 C.F.R. §§63.2520(a) and (b)(1) through (b)(4)]

- 4.5.5. The compliance report shall contain the information specified below:
- a. Company name and address.
 - b. Statement by a responsible official with that official’s name, title, and signature, certifying the accuracy of the content of the report.
 - c. Date of report and beginning and ending dates of the reporting period.
 - d. For each SSM during which excess emissions occur, the compliance report must include records that the procedures specified in the startup, shutdown, and malfunction plan (SSMP) were followed or documentation of actions taken that are not consistent with the SSMP, and include a brief description of each malfunction.

- e. The compliance report shall contain the information on deviations, as defined in 40 C.F.R. §63.2550, according to paragraphs (e)(5)(i), (ii), (iii), and (iv) of section (e)(5) of 40 C.F.R. §63.2520.
- f. [Reserved]
- g. Include each new operating scenario which has been operated since the time period covered by the last compliance report and has not been submitted in the notification of compliance status report or a previous compliance report. For each new operating scenario, the permittee must provide verification that the operating conditions for any associated control or treatment device have not been exceeded and that any required calculations and engineering analyses have been performed. For the purposes of this paragraph, a revised operating scenario for an existing process is considered to be a new operating scenario.
- h. Records of process units added to a process unit group (PUG) as specified in 40 C.F.R. §63.2525(i)(4) and records of primary product redeterminations as specified in 40 C.F.R. §63.2525(i)(5).
- i. Applicable records and information for periodic reports as specified in referenced Subparts F, G, H, SS, UU, WW, and GGG of this part (40 C.F.R. 63) and Subpart F of 40 C.F.R. 65.
- j. *Notification of process change.* Except as specified in section 4.5.6 of this permit, whenever the permittee makes a process change, or changes any of the information submitted in the notification of compliance status report or a previous compliance report, that is not within the scope of an existing operating scenario, the permittee must document the change in the compliance report. A process change does not include moving within a range of conditions identified in the standard batch, and a nonstandard batch does not constitute a process change. The notification must include all of the information below:
 - 1. A description of the process change
 - 2. Revisions to any of the information reported in the original notification of compliance status report
 - 3. Information required by the notification of compliance status report under 40 C.F.R. §63.2520(d) for changes involving the addition of processes or equipment at the affected source.

[45CSR13, R13-2380, 4.5.5; 45CSR34; 40 C.F.R. §63.2520(e)]

- 4.5.6. The permittee must submit a report 60 days before the scheduled implementation date of any of the following changes:
 - a. Any change to the information contained in the pre-compliance report.
 - b. Any change in the status of a control device from small to large.
 - c. A change from Group 2 to Group 1 for any emission point except for batch process vents that meet the conditions specified in 40 C.F.R. §63.2460(b)(6)(i)

[45CSR13, R13-2380, 4.5.6; 45CSR34; 40 C.F.R. §63.2520(e)(10)(ii)]

- 4.5.7. Any change in the information already provided under the Notification Requirements in §63.9 of 40 C.F.R. 63, Subpart A shall be provided to the Director in writing within 15 calendar days after the change. **[45CSR13, R13-2380, 4.5.7; 45CSR34; 40 C.F.R. §63.9(j)]**

- 4.5.8. The permittee shall notify the Director in the Notification of Compliance Status if the alternative recordkeeping requirements of 40 C.F.R. §63.998(b)(5) are being implemented. If the Notification of Compliance Status has already been submitted, the notification must be in the periodic report submitted immediately preceding implementation of the alternative, as specified in 40 C.F.R. §63.999 (c)(6)(iv). **[45CSR13, R13-2380, 4.5.8; 45CSR34; 40 C.F.R. §63.999(b)(5)]**
- 4.5.9. Periodic reports for Batch Process Vents shall include the reporting period dates, the total source operating time for the reporting period, and, as applicable, all information specified in 40 C.F.R. §63.999(c) and in the referencing subpart (40 C.F.R. 63, Subpart FFFF), including reports of periods when monitored parameters are outside their established ranges. Periodic deviation reports shall meet the requirements of 40 C.F.R. §63.999(c). **[45CSR13, R13-2380, 4.5.9; 45CSR34; 40 C.F.R. §63.999(c)]**

4.6. Compliance Plan

- 4.6.1. None.

5.0. Source-Specific Requirements [Metal Parts Degreaser B52A]

5.1. Limitations and Standards

- 5.1.1. The owner or operator of a cold cleaning facility shall:
- a. Provide a permanent, legible, conspicuous label, summarizing the operating requirements.
 - b. Store waste solvent in covered containers.
 - c. Close the cover whenever parts are not being handled in the cleaner.
 - d. Drain the cleaned parts until dripping ceases.
 - e. If used, supply a solvent spray that is a solid fluid stream (not a fine, atomized, or shower-type spray) at a pressure that does not exceed 10 pounds per square inch gauge.
 - f. Degrease only materials that are neither porous nor absorbent.

[45CSR§§21-30.3.a.4, 30.3.a.5, 30.3.a.6, 30.3.a.7, 30.3.a.8, 30.3.a.9]

5.2. Monitoring Requirements

- 5.2.1. None.

5.3. Testing Requirements

- 5.3.1. Test Method ASTM D323-72 shall be used for measuring the solvent true vapor pressure.
[45CSR§21-30.4.e]

5.4. Recordkeeping Requirements

- 5.4.1. Each owner or operator of a solvent metal cleaning source subject to this 45CSR§21-30 shall maintain the following records in a readily accessible location for at least 5 years and shall make these records available to the Director upon verbal or written request:
- a. A record of central equipment maintenance, such as replacement of the carbon in a carbon adsorption unit.
 - b. The results of all tests conducted in accordance with the requirements in section 45CSR§21-30.4 (5.3.1).

[45CSR§21-30.5 and 45CSR§30-5.1.c]

5.5. Reporting Requirements

- 5.5.1. Except as provided in section 45CSR§21-9.3, the owner or operator of any facility containing sources subject to 45CSR§21-5 shall, for each occurrence of excess emissions expected to last more than 7 days, within 1 business day of becoming aware of such occurrence, supply the Director by letter with the following information.

- a. The name and location of the facility;
- b. The subject sources that caused the excess emissions;
- c. The time and date of first observation of the excess emissions; and
- d. The cause and expected duration of the excess emissions.
- e. For sources subject to numerical emission limitations, the estimated rate of emissions (expressed in the units of the applicable emission limitation) and the operating data and calculations used in determining the magnitude of the excess emissions; and
- f. The proposed corrective actions and schedule to correct the conditions causing the excess emissions.

[45CSR§21-5.2]

5.6. Compliance Plan

- 5.6.1. None.

Appendix A: R13-2380D Attachments

DuPont
Washington Works Facility
Permit R13-2380D

Quarterly Operations Log for PVB Resin Production

YEAR: QUARTER:	REACTOR ID	F UNITS OF PRODUCT (PVB) PRODUCED
FIRST MONTH:	B8-1 through B8-4	
	B8-5 through B8-8	
SECOND MONTH:	B8-1 through B8-4	
	B8-5 through B8-8	
THIRD MONTH:	B8-1 through B8-4	
	B8-5 through B8-8	

This record shall be maintained on site for a period of five (5) years from the end of the applicable quarter. Certified copies of these records shall be made available to the Director of the Division of Air Quality or his duly authorized representative upon request. At a time prior to submittal to the Director, all records shall be certified and signed by a “Responsible Official” using the attached Certification of Data Accuracy Statement. If these records are considered to contain confidential business information as identified in the permit application, then the records may be submitted according to the procedures set forth in 45CSR31 – “Confidential Information.”

DuPont
Washington Works Facility
Permit R13-2380D

Scrubber Malfunction Log for PVB Resin Production

	REACTOR ID	TIME SPENT IN PRODUCTION (HRS)	PRODUCT (PVB) PRODUCED (F UNITS)
Beginning Date and Time Date: Time:	B8-1		
	B8-2		
	B8-3		
Online Scrubber ID B08A or B08B	B8-4		
	B8-5		
Ending Date and Time Date: Time:	B8-6		
	B8-7		
	B8-8		

This record shall be maintained on site for a period of five (5) years from the end of the applicable quarter. Certified copies of these records shall be made available to the Director of the Division of Air Quality or his duly authorized representative upon request. At a time prior to submittal to the Director, all records shall be certified and signed by a “Responsible Official” using the attached Certification of Data Accuracy Statement. If these records are considered to contain confidential business information as identified in the permit application, then the records may be submitted according to the procedures set forth in 45CSR31 – “Confidential Information.”

Weekly/Monthly/Quarterly Opacity Record
DuPont; Washington Works
Plant ID No. 107-00001; Permit No. R13- 2380D

Date of Observation: _____

Date Entered by: _____

Reviewed by: _____

Date Reviewed: _____

Describe the General Weather Conditions:

Stack ID / Vent ID / Emission Point ID	
Stack / Vent / Emission Point Description	
Time of Observation	
Visible Emissions? Yes / No	
Consecutive Months of Visible Emissions	
Comments	

CERTIFICATION OF DATA ACCURACY

I, the undersigned, hereby certify that, based on information and belief formed after reasonable inquiry, all information contained in the attached _____, representing the period beginning _____ and ending _____, and any supporting documents appended hereto, is true, accurate, and complete.

Signature¹

(please use blue ink)

Responsible Official or Authorized Representative

Date

Name & Title

(please print or type)

Name

Title

Telephone No. _____

Fax No. _____

¹ This form shall be signed by a "Responsible Official." "Responsible Official" means one of the following:

- a. For a corporation: The president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit and either:
 - (i) the facilities employ more than 250 persons or have a gross annual sales or expenditures exceeding \$25 million (in second quarter 1980 dollars), or
 - (ii) the delegation of authority to such representative is approved in advance by the Director;
- b. For a partnership or sole proprietorship: a general partner or the proprietor, respectively;
- c. For a municipality, State, Federal, or other public entity: either a principal executive officer or ranking elected official. For the purposes of this part, a principal executive officer of a Federal agency includes the chief executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., a Regional Administrator of U.S. EPA); or
- d. The designated representative delegated with such authority and approved in advance by the Director.

Appendix B: R13-2617C Attachment

ATTACHMENT A of R13-2617C for Only the Polyvinyl Butyral Production Area

Emission Point Identification	Source Identification	Source Description	Control Device Identification	Service (VOC/HAP/TAP)	Affected* R13 Permit	Included in Original R21 RACM Plan	Currently Subject to:		Other Applicable Regulations - Citation (MACT/BACT/NSPS/NESHAP etc.)
							R21	R27	
B8AE / B8BE	B8-1	Reactor	B8AC / B8BC	VOC	R13-2380D	Yes	Yes	No	40 CFR 63.2450(a), 40 CFR 63.2460(a), 40 CFR 63.2485(a), 40 CFR 63.2490(a), 40 CFR 63.6(e)(3) excluding 63.2525(j)
B8AE / B8BE	B8-2	Reactor	B8AC / B8BC	VOC	R13-2380D	Yes	Yes	No	40 CFR 63.2450(a), 40 CFR 63.2460(a), 40 CFR 63.2485(a), 40 CFR 63.2490(a), 40 CFR 63.6(e)(3) excluding 63.2525(j)
B8AE / B8BE	B8-3	Reactor	B8AC / B8BC	VOC	R13-2380D	Yes	Yes	No	40 CFR 63.2450(a), 40 CFR 63.2460(a), 40 CFR 63.2485(a), 40 CFR 63.2490(a), 40 CFR 63.6(e)(3) excluding 63.2525(j)
B8AE / B8BE	B8-4	Reactor	B8AC / B8BC	VOC	R13-2380D	Yes	Yes	No	40 CFR 63.2450(a), 40 CFR 63.2460(a), 40 CFR 63.2485(a), 40 CFR 63.2490(a), 40 CFR 63.6(e)(3) excluding 63.2525(j)
B8AE / B8BE	B8-5	Reactor	B8AC / B8BC	VOC	R13-2380D	Yes	Yes	No	40 CFR 63.2450(a), 40 CFR 63.2460(a), 40 CFR 63.2485(a), 40 CFR 63.2490(a), 40 CFR 63.6(e)(3) excluding 63.2525(j)
B8AE / B8BE	B8-6	Reactor	B8AC / B8BC	VOC	R13-2380D	Yes	Yes	No	40 CFR 63.2450(a), 40 CFR 63.2460(a), 40 CFR 63.2485(a), 40 CFR 63.2490(a), 40 CFR 63.6(e)(3) excluding 63.2525(j)
B8AE / B8BE	B8-7	Reactor	B8AC / B8BC	VOC	R13-2380D	Yes	Yes	No	40 CFR 63.2450(a), 40 CFR 63.2460(a), 40 CFR 63.2485(a), 40 CFR 63.2490(a), 40 CFR 63.6(e)(3) excluding 63.2525(j)
B8AE / B8BE	B8-8	Reactor	B8AC / B8BC	VOC	R13-2380D	Yes	Yes	No	40 CFR 63.2450(a), 40 CFR 63.2460(a), 40 CFR 63.2485(a), 40 CFR 63.2490(a), 40 CFR 63.6(e)(3) excluding 63.2525(j)

Note #1 - Formaldehyde (TAP-F) does not qualify as a MACT Wastewater under any Standard

Note #2 - MON MACT has a process vent definition cut-off at 50 ppm. Below this there are no controls since it is not considered to be a process vent.

Note #3 - The WWTP located at Washington Works does not receive any Group 1 Streams as defined by the rule. Hence the applicability of 40 C.F.R. §63.135 and 40 C.F.R. §63.145 are very, very limited.

Note #4 - Sources identified as being "Removed from Service" are considered permanently removed and must undergo 45CSR13 review prior to being returned to service.

*Permit R13-2380C has been superseded and replaced by R13-2380D. Although Attachment A of Permit R13-2617C does not reflect this change, it has been shown in the above table.